

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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APR -1 2002

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Rridgcton and Elmer. New Jersey)

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MM Docket No. 02-26/
RM - 10362FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Audio Division
Media Bureau

COMMENTS AND AMENDED PROPOSAL

Cohanzick Broadcasting Corporation, ("Cohanzick") licensee of Station WSNJ-FM, Bridgeton, New Jersey, and New Jersey Radio Partners, L.L.C. ("New Jersey Radio"), assignee of WSNJ-FM (together, "Joint Parties"), by their respective counsel, submit these comments and an amended proposal to the above-captioned proceeding.¹ The Joint Parties request that the Commission amend the FM Table of Allotments to delete Channel 299B from Bridgeton, New Jersey, and **allot** Channel 300A to Pennsauken, New Jersey as that community's first **local** service

I. PRELIMINARY MATTERS

1. The NPRM was issued at the request of Cohanzick, which petitioned for a change in community of license for WSNJ-FM from Bridgeton to Elmer, New Jersey. Subsequently, New Jersey Radio and Cohanzick filed an application for assignment of license, which was granted on February 14, 2002 (FCC File No, BAL-20020102AAN). After conducting its own independent analysis, New Jersey Radio believes that the public interest would be better served by changing the station's community of license to Pennsauken, New Jersey (pop. 35,737) than to Elmer, New Jersey (pop. 1,571), proposed by Cohanzick (all population figures 2000 U.S.

¹ See Notice of Proposed Rule Making, DA 02-297 (rel. Feb. 8, 2002) ("NPRM"). No. of Copies rec'd
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Census). If this amended proposal is granted, New Jersey Radio or Cohanzyck, as the licensee, will file an application to modify the license of WSNJ-FM to specify operation on Channel 300A at Pennsauken, New Jersey.

2. The Joint Parties are aware of the Commission's recent policy pronouncement in *Tuccoa, Sugar Hill*, and *Lawrenceville*, Georgia, MM Docket No. 98-162 (DA 01-2784, rel. Nov. 30, 2001), stating that a petitioner should not be permitted to amend its proposal without an adequate explanation. Here, circumstances have changed since Cohanzyck filed its petition on September 24, 2001. On January 2, 2002, Cohanzyck filed the Form 314 application to assign WSNJ(AM) and WSNJ-FM to New Jersey Radio. The FCC granted the application on February 14, 2002. Consummation of this transaction is awaiting the outcome of this proceeding. This amended proposal reflects the desire of New Jersey Radio, the assignee, to serve Pennsauken, a large community having no local service.

II. COMPLIANCE WITH THE COMMISSION'S RULES

A. Technical Analysis

3. As demonstrated in the Exhibit E, Figure 1, Channel 300A can be allotted to Pennsauken, New Jersey consistent with Section 73.207 of the Commission's Rules. A 70 dBu signal can be provided to Pennsauken from the proposed reference point. See Figure 2. The relocation will eliminate four current short spacings to Stations WGTU, Gettysburg, Pennsylvania; WBYX, Boyertown, Pennsylvania; WFSI, Annapolis, Maryland; and WPUR, Atlantic City, New Jersey. See Technical Narrative. In addition, the relocation will eliminate sizable overlap areas totaling 4,747 sq. km caused by these short spacings, and bring interference-free service to 2,142,046 persons residing within those areas. See Figure 5

4. The relocation of WSNJ-FM to Pennsauken will result in a net increase in population of 1,283,520 persons able to receive a 60 dBu signal from the station, although there

will be a decrease in area served. **See** Figure 3. The loss area will continue to be well served by more than five aural services. **See** Figure 4

B. Change in Community of License

5. In *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("*Community of License*"), the Commission stated that in order to grant a change in community of license: (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community of license must retain local service; and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the Commission's allotment priorities. The proposed change in community of license of WSNJ-FM from Bridgeton to Pennsauken satisfies these prerequisites. First, the proposed use of Channel 300A at Pennsauken is mutually exclusive with the current use of Channel 299B at Bridgeton. *See* Figure 1. Second, Bridgeton will not be deprived of local service since Stations **WNJB-FM and WSNJ(AM)** will remain licensed to Bridgeton. Third, the Pennsauken **proposal** is preferred under the Commission's priorities since Pennsauken (**pop.** 35,737) would receive a first local service (Priority 3), while retaining Channel 299B at Bridgeton **would** give that community a third local service (Priority 4). *See Revision of FM Assignment Policies and Procedures, supra*

6. Pennsauken is located within the Philadelphia Urbanized **Area.**⁷ Therefore, this relocation implicates the Commission's policy concerning the potential migration of stations

The **NPKM** indicated that **Cohanick** had failed to mention that from its current transmitter site, WSNJ-FM places a 70 dBU contour over 100 percent of the Vineland-Millville, New Jersey Urbanized Area and 1.2 percent of the Wilmington, Delaware Urbanized Area. However, even so, no *Tuck* showing **wa**s required since no change in transmitter site was proposed. *See Kankakee and Park Forest, Illinois*, 16 FCC Rcd 6768, 6770 (2001) (no *Tuck* showing required to demonstrate independence of Park Forest from Kankakee even though station would place 70 dBU contour over 100% of Kankakee Urbanized Area). The relocation to Pennsauken proposed herein would eliminate 70 dBU coverage to these Urbanized Areas.

from rural areas to urban areas. See *Elizabeth City, North Carolina and Chesapeake, Virginia*, 9 FCC Rcd 3586 (1994). As indicated in the *NPRM*, WSNJ-FM currently serves an Urbanized Area, and therefore the station is not moving from a rural area. Nevertheless, the Joint Parties are providing a showing that Pennsauken is an independent community deserving of a first local service preference.

7. In making the determination whether to award an urbanized community a first local service preference, the Commission will consider the extent the station will provide service to the entire Urbanized Area, the relative populations and proximity of the suburban and central city, and, most importantly, the independence of the suburban community. *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988). In this case, from the proposed transmitter site, WSNJ-FM will place a 70 dBu contour over less than 50 percent of the Philadelphia Urbanized Area. See Technical Narrative. Pennsauken is located 8.3 kilometers away from Philadelphia. The 2000 Census population of Pennsauken (35,737) is 2.4 percent of the population of Philadelphia (1,517,550). These figures are similar to those of other suburban communities granted a first local preference. See, e.g., *Anniston, Alabama, et al.*, 16 FCC Rcd 3411, recon. denied, 2001 FCC Lexis 6055 (2001) and cases cited therein. In any event, the Commission has repeatedly stated that the factors of relative size and proximity are less important than evidence of independence. See *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995). The following analysis of the eight *Tuck* factors demonstrates the independence of Pennsauken from Philadelphia.

(I) ***Extent to which the residents of Pennsauken, New Jersey, work in the Township of Pennsauken.***

The population of Pennsauken was 34,733 in 1990 (1990 U.S. Census Bureau, Census 1990) and 35,717 in 2000 (U.S. Census Bureau, Census 2000). According to the U.S.

Census Database for 1990 (the last year for which figures **are** available), **3,685 of** the **16,584** workers (22.2%) work in their place of residence. **A** few of the major employers within the city are Aluminum Shapes. L.L.C., J & J Snacks Food Corp., and the Pennsauken School District. Aluminum Shapes. L.L.C. employs approximately 1000 people in the **manufacturing**, fabrication, painting and anodizing of common alloy aluminum extrusions. J&J Snacks Food Corp. employs over 300 people in the manufacture of a variety of snack products such as pretzels, frozen beverages, frozen deserts, pastries, funnel cakes and cookies with **sales of \$262** million in 1998. According to Terry **Carr** of the Township of Pennsauken Economic Development Department, there are approximately 1,300 businesses in Pennsauken and six major industrial parks which employ residents **of** Pennsauken. In addition, the Township **is** in the process **of** developing its waterfront properties for residential and economic purposes. See Exhibit 1

(2) *Newspapers and other media cover Pennsauken's needs and interests.*

Residents are served by **a** local daily newspaper, the **Courier-Post**. It is the **only** local daily newspaper published in **the** south New Jersey region. It is published in the neighboring community of Cherry Hill, but is widely-circulated in and delivered and sold to the residents of Pennsauken. Periodically, on the front page of an edition is a column titled "Pennsauken Community Notebook," that contains local news articles on topics such as local politics, local high school sports and local construction projects. **See** Exhibit 1.

All Around Pennsauken is a monthly community newspaper published by the Business Industry and Government Council in Pennsauken which is composed of local Township officials and business community. The **newspaper** contains **local news articles** on topics such as high school sports, **local** politics, weddings, local events and local township projects. **Local**

businesses and the Township Government subsidize the cost of publishing the newspaper. *See* Exhibit 1.

The Township of Pennsauken maintains its own webpage at <www.twp.pennsauken.nj.us>. By accessing this webpage, residents can become **aware** of a wide variety of facts and events concerning Pennsauken, including information regarding township officials, public services, public meetings, township development, township job opportunities and community events. Sample pages are attached in Exhibit 1.

Pennsauken has an alternative website, <www.pennsaukennj.com>. By accessing this webpage, township residents can obtain additional information about weekly and community events, township public schools and government, federal, state and local representatives, organizations and associations, local churches and local museums. Sample pages are attached in Exhibit 1

(3) ***Community leaders and residents perceive Pennsauken as being separate from Philadelphia.***

The Township of Pennsauken has its own unique identity and history that are separate from that of Philadelphia. Pennsauken is located along the Pennsauken Creek, an estuary of the Delaware River. Pennsauken is an urban, middle class community. It is 10.5 square miles in area and is home to persons of a broad range of ethnic backgrounds. The community has a long history dating back to the 17th century. In **1633**, English settlers landed near what is present-day Pennsauken. In 1684, the native Indian population gave **up** their claims to the land around Pennsauken Creek. Pennsauken emerged from a group of settlements that developed their own identities that were ultimately subdivided through the **land** grant process. **Pennsauken Village** was founded in 1880 as a residential community. The Township of Pennsauken was incorporated in 1892. *See* Exhibit 1.

(4) Pennsauken has its own local government and elected officials.

Pennsauken's township government functions independently of any other governmental units. The Township Committee has five-members who each serve three-year terms. The Committee selects a Mayor and a Deputy Mayor from the members of the Committee, who serve a one-year term. Pennsauken has a municipal solicitor, city clerk, tax assessor, tax collector, animal warden, fire prevention chief, police chief, librarian, public safety director, economic development director, senior citizens coordinator, electrical and plumbing inspector, recreation director and public works director. There are approximately **450 local** government employees, including employees of the following departments: Fire Department, Police Department, Mayor's Office, Pennsauken Sewage Authority, Treasurer's Office, Purchasing Department, **Parks** and Recreation, Planning and Zoning, Highway/Public **Works** Department, Collector's Office, Assessor's Office, Clerk's Office, Economic Development and Code Enforcement. The Township of Pennsauken had a total budget of \$26,392,249 for fiscal year 2000. See Exhibit 1

In addition, the Merchantville-Pennsauken Water Commission **was** founded to supply the water needs for both the Borough **of** Merchantville and the Township of Pennsauken. Five commissioners serve on the board, of which three come from Pennsauken. See Exhibit 1.

(5) The Township of Pennsauken has its own zip codes and separate governmental listings in the local telephone book.

The zip codes designated exclusively for the Township **of** Pennsauken are 08108 and 08110. See Exhibit 1. The U.S. Postal Service operates a Post Office at 4724 Westfield Avenue in Pennsauken to serve the Township. See Exhibit 1. Residential and business lists for the Township of Pennsauken are found in the Camden County telephone **book** published by Verizon, which contains a separate section for Pennsauken township government telephone listings. See Exhibit 1

(6) *The Township of Pennsauken has its own commercial establishments and health facilities.*

As previously noted, there are approximately 1,300 businesses in Pennsauken. A substantial number of these businesses identify with the community by using "Pennsauken" in their name, for example: Pennsauken Texaco, Pennsauken Exxon, United Artists Pennsauken 11 Movie Theaters and Sovereign Bank of Pennsauken. Pennsauken retail businesses include a wide variety of companies. **See** Exhibit I

A number of health care providers are located in the Township of Pennsauken. **See** Exhibit I. Medical services are available for community residents from many local doctors, some of whom practice with the following groups: Pennsauken Family Practice, Pennsauken Medical Center, Pennsauken Adult Training Center, Family Care Associates, Partners in Primary Care and Lickfield Family Medicine. Veterinary services may be obtained from Pennsauken Animal Hospital and Westfield Animal Hospital.

Pennsauken is also home to a number of religious organizations, such as **East** Pennsauken United Methodist Church, St. Cecilia Roman Catholic Church, Calvary Community Baptist Church, Bethel United Methodist Church and many others. **See** Exhibit I. There **are** many civic and charitable organizations in Pennsauken, including Pennsauken Lions Club, American Legion Post 125, Pennsauken Historical Society, AMVets Post 101, Pennsauken Business Industry and Government Council, and The Mozart & Friends Opera Festival.

Community activities and events that occur in the Township of Pennsauken include Adopt-a-Road, Flower Sign, Holiday Food Drive, Pennsauken Christmas Parade, Pennsauken Annual Picnic, Senior Citizens Night, Hispanic Festival, **4th** of July Fireworks, free concerts and theater, Newtown Colony Arts and Music Festival and numerous races. These

events are held at the Pennsauken High School Stadium, **Cooper** River Park and the South Jersey Expo Center. *See* Exhibit I

(7) ***Pennsauken is a separate and distinct advertising market from Philadelphia.***

According to the Economic Development Department, businesses in Pennsauken advertise in the *Courier-Post* and ***AN Around Pennsauken***, which enable them to reach the residents of Pennsauken and do not need to rely on Philadelphia media sources. According to a ***Courier-Post*** staffperson, Pennsauken businesses advertise predominantly with the newspaper. Residents may also access the Township's webpage to learn about community events and news. Thus, the residents of Pennsauken do not need to turn to Philadelphia media sources in order to find out what is happening in their community. ***See*** Exhibit I.

(8) ***The Township of Pennsauken has its own library and its police and fire protection are provided independent of any other jurisdiction.***

The Township of Pennsauken operates the Pennsauken Free Library that serves the local population. The Pennsauken Free Library is open seven days a week. The Township's own school district, Pennsauken School District, consists of 6000 students from pre-K through 12 and twelve schools. Each school has its own website. The Pennsauken School District is governed by the Pennsauken Board of Education that consists of a President, Vice President and seven members. There are also numerous private and parochial schools in Pennsauken. ***See*** Exhibit I.

Pennsauken maintains its own police and fire departments. The fire department is composed of a fire chief, ten paid fireman, and four fire inspectors. The majority of the department is staffed by volunteer firemen. Pennsauken has **six** fire stations located throughout the township. The department provides *fire*, search and rescue, HAZMAT and extrication

services. The police department is composed of ninety-two officers and a police chief with a single main station location. The Township is currently constructing a substation.

According to Elwood Martz, the head **of** the Township of Pennsauken Parks & Recreation Department, Pennsauken has a full range of parks and recreation services. Many sports programs are offered through the Parks & Recreation Department, such as tennis, soccer, softball, baseball and basketball. In addition, the city operates the Pennsauken Municipal Swimming Pool. The Township of Pennsauken owns the Pennsauken Country **Club**, which is operated autonomously with the Township's oversight. Comcast operates the Flyer Skate Zone, a hockey rink used by the residents of Pennsauken.

III. CONCLUSION

Grant of this amended proposal is in the public interest because Pennsauken will receive a first local service, an additional 1,283,520 people will receive radio service, and four preexisting short spacings will be eliminated. No other radio stations are affected, and the transmitter site relocation can be implemented rapidly. Accordingly, the Commission should grant this proposal.

Respectfully submitted,

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April 1, 2002

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**ENGINEERING STATEMENT
IN SUPPORT OF
COMMENTS AND AMENDED PROPOSAL**

MM DOCKET 02-26, RM-10362

**Cohanzick Broadcasting Corporation
New Jersey Radio Partners, L.L.C.**

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April, 2002

Engineering Statement

In Support of

**Comments and Amended Proposal
MM Docket 02-26 (RM-10362)
Cohanzick Broadcasting Corporation
New Jersey Radio Partners, L.L.C.**

General

The instant comments and amended proposal **was** prepared Cohanzick Broadcasting Corporation ("Cohanzick"), licensee of WSNJ, channel 299B, Bridgeton, New Jersey; and New Jersey Radio Partners, L.L.C., assignee of WSNJ. (These groups are herein referred to as "Joint Parties."). The Joint Parties propose to delete channel 299B at Bridgeton, New Jersey, *so* that channel 300A can be allotted to Pennsauken, New Jersey that community's first local service. They propose that the license of WSNJ be modified accordingly. Bridgeton, New Jersey will continue to receive service from WSNJ-AM, 1240 kHz and WNJB, channel **207A** (89.3 MHz). No other spectrum changes are required for the allotment of channel **300A** at Pennsauken.

Methods

The Joint Parties' comments and amended **proposal** is presented in sections, in which each channel or licensed facility where a change is proposed is discussed individually. **All** sections begin with an allocation or channel spacing study. Additional exhibits then support the proposed modification's technical compliance.

The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and gain/loss areas were conducted using a professional mapping program from MapInfo Corporation, Version 5.5. The program contains the

exact community boundaries of the relevant cities. The boundaries of Pennsauken, NJ were cross-checked with the U S. Census Bureau's TIGER maps.

Nature of The Joint Parties Amended Proposal

The Joint Parties propose to delete channel 299B at Bridgeton, NJ and substitute channel 300A at Pennsauken, New Jersey for use by **WSNJ**. In order to accomplish this, various channels and licensed facilities need to **be** modified in order to create compliance with §73.207. The amended proposal provides for first local service at Pennsauken, New Jersey and retaining local service at Bridgeton with WSNJ-AM and WNJB(FM). It results in a decrease in the area served, yet it also results in a considerable increase in population served.

EXHIBITS EXPLAINED

WSNJ

WSNJ currently has existing short spacing to four other stations: WGTY, channel **299B** in Gettysburg, PA; WBYN, channel 298B, Boyertown, Pennsylvania; WFSI, channel 300B, Annapolis. **MD**; and WPUR, channel 29781, Atlantic City, New Jersey. Exhibit E, Figure 1 shows the current **WSNJ** facility and these short spacings. The instant comments and amended proposal eliminates the short spacings to all of these facilities.

Exhibit E, Figure 1A is an allocation study depicting the spacing to **all** known **FM** facilities that are affected by the allotment of channel 300A at Pennsauken. The study shows the elimination of the short spacing to the four stations mentioned earlier (WGTY, WBYN, WFSI, and WPUR). Exhibit E, Figure 2 is a map generated using **the** programs and techniques in the Methods section of the instant amended proposal. This study depicts the WSNJ channel 300A allotment coordinates, a class A 70 dBu contour, and the

community boundaries of Pennsauken. It demonstrates full compliance with §73.315 of the Rules. (The 70 dBu contour shown on this map covers approximately **45.5%** of the Philadelphia urbanized area.) Exhibit E, Figure 3 is a map demonstrating the gain and loss area of the proposed 60 dBu contour for channel **300A** at Pennsauken and the licensed 54 dBu of WSNJ. Exhibit E, Figure 4 is remaining services study demonstrating that all points inside the loss area **will** continue to receive **at least 5** aural services. Exhibit E, Figure 5 shows the considerable interference (both in area and population) that the instant proposal will eliminate. The existing WSNJ facility overlaps 4,747 km² and 2,142,046 persons. The instant comments and amended proposal eliminates all of this undesirable interference.

The Joint Parties Amended Proposal Gain-Loss Area

Exhibit E, Figure 3 shows the station's **loss** and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's 2000 population figures. It depicts a cumulative total **loss** area of 7,013 square kilometers and a gain area of 1,866 square kilometers. The Joint Parties amended proposal has a net area loss of 5,147 square kilometers.

The population loss has a cumulative loss of 1,260,208 persons, while the population gain is 2,543,728 persons. Therefore, the net population gain of the Joint Parties amended proposal is 1,283,520 persons.

Conclusion

The Joint Parties' amended proposal has demonstrated that it **is** in technical compliance with the present Commission Rules concerning such actions. The counterproposal

produces a new first local service at Pennsauken, New Jersey. The counterproposal creates a net increase in new 60-dBu service to **1,283,520** persons.

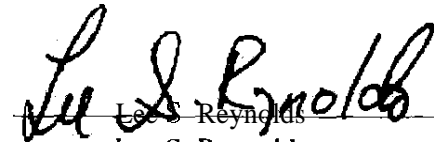
Statement of the Consultants

The instant engineering portion of this amended proposal **was** prepared for the Joint Parties and supports comments and an amended proposal to MM Docket 02-26, RM-**10362**. It **was** developed by Reynolds Technical Associates (RTA) and may not be used for purposes other than submission to **the** Commission by the Joint Parties.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of **RTA**.

The information in this application is compiled from the most recent Commission and outside data. **RTA** is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:


Lee S. Reynolds

April 1st, 2002

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Chelsea, Alabama 35043
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**Engineering Statement
In Support of
Comments and Amended Proposal**

WSNJ-FM, Channel 300A, Pennsauken, New Jersey

**WSNJ-FM Current Facility Channel Spacing Study
(Demonstrating the Existing Short Spacings to WGTY, WBYN, WFSI, and WPUR)**

WSNJ Licensed Coordinates:

North Latitude: 39-27-32

West Longitude: 75-12-12

REFERENCE						DISPLAY DATES	
39 27 32 N			CLASS = B			DATA	03-23-02
75 12 12 W			current Spacings			SEARCH	03-26-02
----- Channel 299 - 107.7 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin

WSNJPM	LIC 299B	Bridgeton	NJ	0.00	0.0	241.0	-241.00
RADD	ADD 299B	Elmer	NJ	0.00	0.0	241.0	-241.00
WSNJPH	CP 299B	Bridgeton	NJ	0.00	0.0	241.0	-241.00
RDEL	DEL 299B	Bridgeton	NJ	0.00	0.0	241.0	-241.00
Of no concern:							
Different forms of the WSNJ licensed facility							
WGTY	LIC 299B	Gettysburg	PA	156.19	287.0	241.0	-84.81
WBYN	LIC 298B	Boyertown	PA	111.76	340.1	169.0	-57.24
WFSI	LIC 300B	Annapolis	MD	135.65	248.1	169.0	-33.35
WPUR	LIC 297B1	Atlantic City	NJ	68.50	98.9	71.0	-2.50
Of note:							
Facilities that WSNJ currently short spaces.							
Instant amended proposal eliminates all these							
Short spacings.							
WTOFPM	LIC 299B	Warrenton	VA	241.19	251.5	241.0	0.19
WKHI.C	CP 298B1	Fruitland	MD	145.94	196.6	145.0	0.94
ALLO	RSV 298B1	Fruitland	MD	147.06	197.1	145.0	2.06
WBLS	LIC 298B	New York	NY	176.83	35.4	169.0	7.83
WTDK	LIC 296A	Federalburg	MD	90.00	211.5	69.0	21.00
WKHI	LIC 298B	Exmore	VA	199.83	192.4	169.0	30.83
WPCFM	LIC 245B	Atlantic City	NJ	65.65	97.6	20.0	45.65

Exhibit E, Figure I

**Engineering Statement
In Support of
Comments and Amended Proposal**

WSNJ-FM. Channel 300A, Pennsauken, New Jersey

**WSNJ-FM Proposed Channel 300A Allocation Study
(Demonstrating the Elimination of Short Spacings to WGTY, WBYN, WFSI, and WPUR)**

Channel **300A** Coordinates:

North Latitude: 40-00-12

West Longitude: 75-01-19

REFERENCE				CLASS = A		DISPLAY DATES	
40 00 12 N						DATA	03-23-02
75 01 19 W				Current	Spacings	SEARCH	03-27-02
----- Channel 300 - 107.9 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin

Community of		Pennsauken	NJ	5.29	213.4		
Reference Coordinates:							
North Latitude: 39-57-49							
West Longitude: 75-03-22							

WSNJPH	LJC 2998	Bridgeton	NJ	62.42	194.4	113.0	-50.58
RDEL	DEL 2998	Bridgeton	NJ	62.42	194.4	113.0	-50.58
RADD	ADD 2998	Elmer	NJ	62.42	194.4	113.0	-50.58
WSNJFM	CP 2998	Bridgeton	NJ	62.42	194.4	113.0	-50.58
Of no concern:							
Multiple entries for WSNJ's licensed facility							

*WBYN	LIC 298B	Boyertown	PA	69.74	310.0	69.D	0.74
*WFSI	LIC 3008	Annapolis	MD	179.69	231.9	178.0	1.69
WKRF	LIC 300A	Tobyhanna	PA	119.37	345.6	115.0	4.37
WEBE	LIC 3008	Westport	CT	202.47	49.5	178.0	24.47
*WPUR	LIC 29781	Atlantic City	NJ	88.14	143.9	48.0	40.14
WBLS	LIC 298B	New York	NY	123.76	46.3	69.0	51.76
*WGTY	LIC 2998	Gettysburg	PA	165.55	264.9	113.0	52.55

- * Stations to which WSNJ is currently short spaced. The amended **proposal** eliminates these short spacings.

Montgomeryville

**WSNJ, Pennsauken, NJ
Hypothetical Class A
70 dBu Contour Map**



Exhibit E, Figure 2

Gain Area = 1,866 sq km
Loss Area = 7,013 sq km
Pop. Gain = 2,543,728
Pop. Loss = 1,260,208

WSNJ, Pennsauken, NJ
Gain/Loss
Study Map

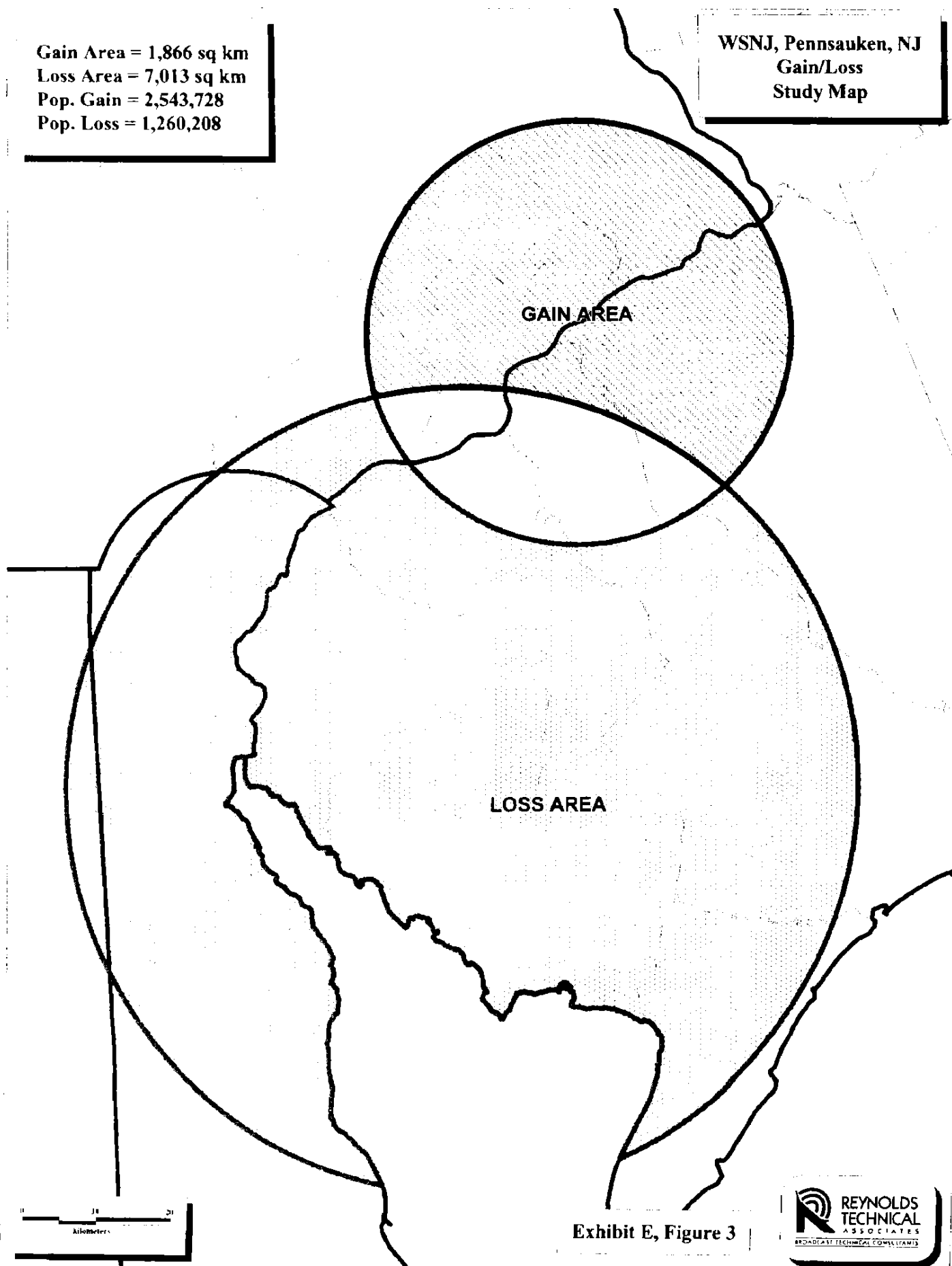
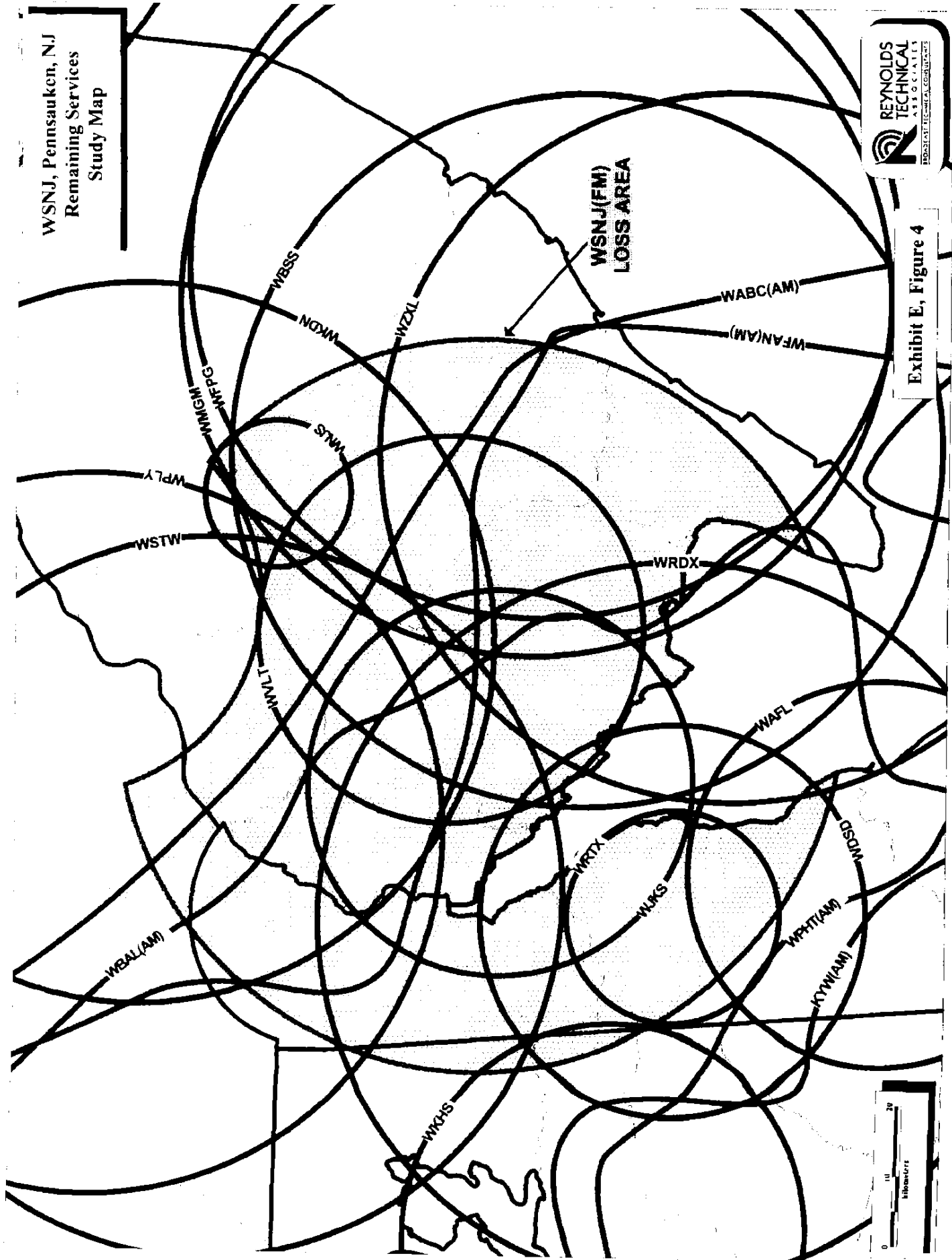


Exhibit E, Figure 3

WSNJ, Pennsauken, NJ
Remaining Services
Study Map



Exhibit E, Figure 4



Total Existing Overlap Area = 4,747 sq km
Total Population In Existing Overlap = 2,142,046

WSNJ, Pennsauken, NJ
Existing Interference Area
Eliminated in Instant Proposal

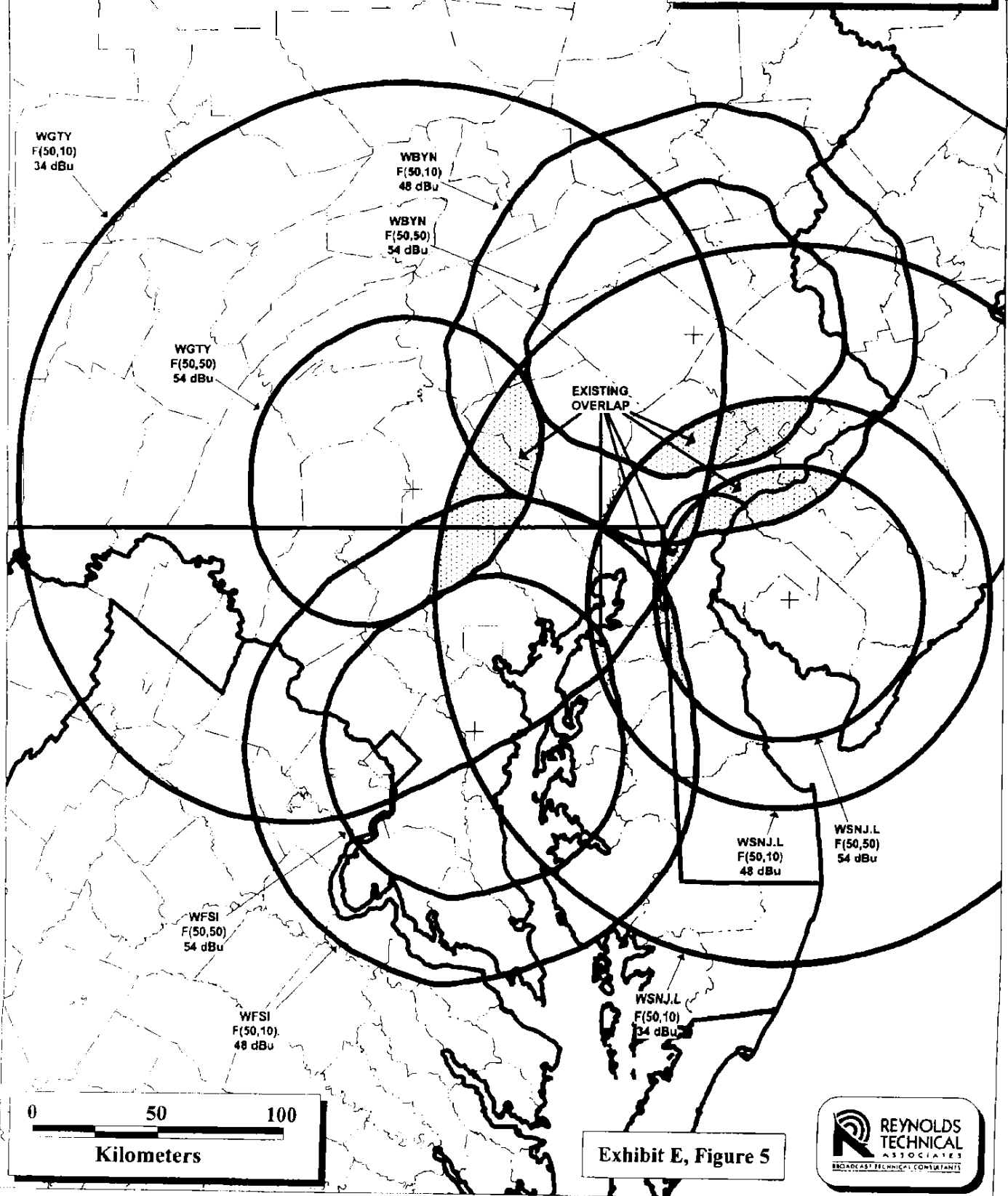


Exhibit E, Figure 5



EXHIBIT 1

U.S. Census Bureau

American FactFinder

Main | Search | Feedback | FAQs | Glo



Quick Tables

QT-P3. Race and Hispanic or Latino: 2000

Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data

Geographic Area: Pennsauken township, Camden County, New Jersey

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see
<http://factfinder.census.gov/home/en/data/notes/expsf1u.htm>

subject	Number	Percent
RACE		
Total population	35,737	100.0
One race	34,841	97.5
White	21,479	60.1
Black or African American	8,641	24.2
American Indian and Alaska Native	124	0.3
American Indian	64	0.2
Alaska Native	0	0.0
Both American Indian and Alaska Native	0	0.0
American Indian or Alaska Native, not specified	60	0.2
Asian	1,636	4.6
Asian Indian	99	0.3
Chinese	222	0.6
Filipino	212	0.6
Japanese	12	0.0
Korean	76	0.2
Vietnamese	825	2.3
Other Asian category	157	0.4
Two or more Asian categories	31	0.1
Native Hawaiian and Other Pacific Islander	7	0.0
Native Hawaiian	1	0.0
Samoan	0	0.0
Guamanian or Chamorro	1	0.0
Other Pacific Islander category	5	0.0
Two or more Native Hawaiian or Other Pacific Islander categories	0	0.0
Some other race	2,954	8.3
Two or more races	896	2.5
Two races including Some other race	438	1.2
Two races excluding Some other race, and three or more races	458	1.3
Two races excluding Some other race	389	1.1
Three or more races	69	0.2
HISPANIC OR LATINO		
Total population	35,737	100.0
Hispanic or Latino (of any race)	5,126	14.3
Mexican	218	0.6
Puerto Rican	3,629	10.2
Cuban	32	0.1
Other Hispanic or Latino	1,247	3.5
Not Hispanic or Latino	30,611	85.7
RACE AND HISPANIC OR LATINO		
Total population	35,737	100.0
One race	34,841	97.5
Hispanic or Latino	4,810	13.5
Not Hispanic or Latino	30,031	84.0
Two or more races	896	2.5
Hispanic or Latino	316	0.9
Not Hispanic or Latino	580	1.6

(X) Not applicable.

Source: U.S. Census Bureau. Census 2000 Summary File 1, Matrices P3, P4, PCT4, PCT5, PCT8, and PCT11

U.S. Census Bureau

American FactFinder

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P046. PLACE OF WORK---PLACE LEVEL - Universe: Workers 16 years and over
Data Set: 1990 Summary Tape File 3 (STF 3) - Sample data

NOTE: For information on confidentiality, sampling error, nonsampling error, and definitions, see <http://factfinder.census.gov/home/en/datanotes/expstf390.htm>.

	Pennsauken CDP, New Jersey
Living in a place.	
Worked in place of residence	3,685
Worked outside place of residence	12,899
Not living in a place	0

U.S. Bureau of the Census
1990 Census of Population and Housing

Standard Error/Variance documentation for this dataset:
[Variance Document for STF 3](#)